

EXHIBIT A1

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Momcozy's Proposed Constructions and Identification of Evidence

Claim Language (Disputed Terms in Bold)	Patent(s), Claim(s)	Plaintiffs' Proposed Construction and Evidence in Support ¹
"in-bra wearable device"	'893 Patent, claim 1 '380 Patent, claims 1, 26, 29, 44 '381 Patent, claim 1	<p><u>Proposed Construction:</u> "device that is entirely contained within bra when worn"</p> <p><u>Intrinsic Evidence:</u> '380 Patent at 3:37-43, 3:57-58, 6:57-61, 7:17-19, 7:37-40, 15:5-8, 20:22-28, 28:28-34, 30:58-64, 31:50-67, 32:43-53, 41:41-42, Fig. 32, Fig. 36</p> <p>U.S. Patent Application No. 17/203,327 Prosecution History at pg. Elvie_Momcozy_0002097, Elvie_Momcozy_0002113, Elvie_Momcozy_0001657-58.</p> <p>U.S. Patent Application No. 17/181,057 Prosecution History at pg. MCZY0006710, MCZY0006777, MCZY0006998.</p> <p>U.S. Patent Application No. 16/009,547 Prosecution History at MCZY0004435.</p> <p>U.S. Patent Application No. 17/203,292 Prosecution History at pg. MCZY0007950, MCZY0007954, MCZY0008732, MCZY0008902.</p> <p>U.S. Patent Application No. 17/203,050 Prosecution History at pg. Elvie_Momcozy_0000817-18.</p> <p><u>Extrinsic Evidence:</u> AU Patent Application Pub. No. 201030058 ("Weber") [MCZY0003288]</p>

¹ The specifications of the '380, '381, and '893 Patents are all similar. Citations to one of the three patents is applicable to the specifications of the other two patents.

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		<p>Chinese Utility Model Patent No. CN 205626591 U ("Jian") [MCZY0001928, MCZY0001938, MCZY0001946]</p> <p>Chinese Utility Model Patent No. CN 205913571 U ("Fang") [MCZY00016749, MCZY0001694]</p> <p>Chinese Utility Model Patent No. CN 206473606 to Zheng ("Zheng") [MCZY0003426]</p> <p>U.S. Patent Application No. 2019/0224389 ("Garbez '389") [MCZY0001820]</p> <p>U.S. Patent Application Pub. No. 2008/0275386 ("Myers '386") [MCZY0002416]</p> <p>U.S. Patent Application Pub. No. 2015/0283311 ("Alvarez") [MCZY0001200]</p> <p>U.S. Patent Application Pub. No. 2016/0206794 ("Makower") [MCZY0002156]</p> <p>U.S. Patent Application Pub. No. 2018/0333523 ("Chang") [MCZY0001467]</p> <p>U.S. Patent Application Pub. No. 2018/0361040 ("O'Toole") [MCZY0002493]</p>
"a pump / an air pump / the pump"	'893 Patent, claim 1-3, 27 '381 Patent, claims 1, 11, 26, 29	<p><u>Proposed Construction:</u> "Piezo air pump"</p>

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	'380 Patent, claims 1, 5, 6, 9-11, 26, 29, 44	<p><u>Intrinsic Evidence:</u></p> <p>'893 Patent at Abstract, 3:66-4:4, 7:18-24, Figs. 40-44</p> <p>'380 Patent at Abstract, 3:57-61, 5:15-26, 6:14-17, 7:7-13, 13:42-43, 14:52-53, 15:3-4, 20:59-62, 22:52-54, 33:1-6, 33:1-34:31, 34:39, 35:21-43, 49: 47-54, 53:21-23, 55:1-9, 55:47-55, 57:54-57, 59:13-21, 60:32-40, 70:23-36, Fig. 8, Fig. 26 ("Piezo Pumps"), Figs 40-44.</p> <p>U.S. Patent Application No. 17/203,327 Prosecution History at pg. Elvie_Momcozy_0002510 (lns. 15-27, ln. 21), Elvie_Momcozy_0002114-15, Elvie_Momcozy_0002264, Elvie_Momcozy_0002309, Elvie_Momcozy_0001967, Elvie_Momcozy_0002009-10, Elvie_Momcozy_0002013, Elvie_Momcozy_0002017, Elvie_Momcozy_0002054, Elvie_Momcozy_0001888, , Elvie_Momcozy_0001890-91, Elvie_Momcozy_0001474.</p> <p>U.S. Patent Application No. 17/181,057 Prosecution History at MCZY0006711, MCZY0006713, MCZY0007175, MCZY0007201, MCZY0007202, MCZY0007281, MCZY0007282, MCZY0007286, MCZY0007367, MCZY0007370-71, MCZY0007483, MCZY0007484, MCZY0007514-15, MCZY0007517-18, MCZY0007525, MCZY0007605, MCZY0007606, MCZY0007611, MCZY0007637-38, MCZY0007641-42, MCZY0007648, MCZY0007698, MCZY0007699, MCZY0007700, MCZY0007704.</p> <p>'380 Grandparent Patent Prosecution History at MCZY0004493, MCZY0004494, MCZY0006242-44, MCZY0006251-54, MCZY0006310, MCZY0006311, MCZY0006321, MCZY0006336-38,</p>

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		<p>MCZY0006339, MCZY0006341-55, MCZY0006387, MCZY0006389, MCZY0006436-54, MCZY0006457, MCZY0006477, MCZY0006518-19, MCZY0006530-31, MCZY0006539.</p> <p>U.S. Patent Application No. 17/203,292 Prosecution History at MCZY0007953, MCZY0008476, MCZY0008616-17, MCZY0008735, MCZY0007912-13, MCZY0009265, MCZY0009271, MCZY0010177.</p> <p>U.S. Patent Application No. 17/203,050 Prosecution History at pg. Elvie_Momcozy_0000601, Elvie_Momcozy_0000561, Elvie_Momcozy_0000327.</p> <p><u>Extrinsic Evidence:</u> [NONE]</p>
<p>“external surface of the housing”</p>	<p>'893 Patent, claim 1 '380 Patent, claim 29</p>	<p><u>Proposed Construction:</u> “surface of the pump housing that is exposed to its outside environment”</p> <p><u>Intrinsic Evidence:</u> '380 patent at 6:57-61, 10:38-43, 10:55-56, 11:18-23.</p> <p>U.S. Patent Application No. 17/203,327 Prosecution History at pg. Elvie_Momcozy_0001428, Elvie_Momcozy_0001655, Elvie_Momcozy_0001913.</p> <p><u>Extrinsic Evidence:</u> American Heritage Dictionary of the English Language, Fifth Edition, 2011, “external” [MCZY0004283]</p>

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		<p>Collins English Dictionary, Twelfth Edition, 2014, "external" [MCZY0004315]</p> <p>Dictionary Science and Tech and Technology, Second Edition, 2007, "external" [MCZY0004307]</p> <p>Merriam-Webster collegiate dictionary, Eleventh Edition, 2003, "external" [MCZY0004329]</p> <p>New Oxford American Dictionary, Third Edition, 2010, "external" [MCZY0004338]</p>
<p>"attached / attach / attachable / attaches"</p>	<p>'893 Patent, claims 1, 17, 20</p> <p>'380 Patent, claims 1, 9, 11, 15, 21, 29, 37</p> <p>'381 Patent, claims 1, 14, 17</p>	<p><u>Proposed Construction:</u> "directly connected to/ directly connect to"</p> <p><u>Intrinsic Evidence:</u> '893 patent at 5:50-57, 6:2-14, 7:5-8, 8:43-49, 25:36-47, 35:65-67, 57:4-12, 61:2-12, 61:52-61, 62:53-62, 63:41-53, 64:55-64, 67:3-10, 67:41-51, Fig. 2, Fig. 4.</p> <p><u>Extrinsic Evidence:</u> American Heritage Dictionary of the English Language, Fifth Edition, 2011, "attach" [MCZY0004283]</p> <p>Collins English Dictionary, Twelfth Edition, 2014, "attach" [MCZY0004315]</p> <p>Dictionary Science and Tech and Technology, Second Edition, 2007, "attach" [MCZY0004307]</p>

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		<p>Merriam-Webster collegiate dictionary, Eleventh Edition, 2003, "attach" [MCZY0004329]</p> <p>New Oxford American Dictionary, Third Edition, 2010, "attach" [MCZY0004338]</p>
"milk container"	<p>'893 Patent, claims 1, 13, 16-23, 26-27</p> <p>'380 Patent, claims 1, 6, 8-12, 26-29, 33, 35-38, 43-46</p> <p>'381 Patent, claims 1, 9, 13-18, 20, 21, 24</p>	<p><u>Proposed Construction:</u> "container collecting milk that is separate from the breast shield"</p> <p><u>Intrinsic Evidence:</u> '380 patent at 1:16-26, 1:38-40, 6:5-9, 6:19-21, 6:40-43, 8:29-32, 12:45-49, 35:45-47, 35:51-53, 35:57-59, 35:65-67, 36:34, 37:24-26, 37:39-42, 38:50-51, 42:53-55.</p> <p>U.S. Patent Application No. 17/203,327 Prosecution History at Elvie_Momcozy_0002498, Elvie_Momcozy_0002164, Elvie_Momcozy_0002166, Elvie_Momcozy_0002172 (lns. 11-17), Elvie_Momcozy_0002177 (lns. 4-12), Elvie_Momcozy_0002275 (lns. 14-17), Elvie_Momcozy_0002276 (lns. 23-26).</p> <p>'380 Patent Parent Prosecution History at MCZY0007127.</p> <p><u>Extrinsic Evidence:</u> American Heritage Dictionary of the English Language, Fifth Edition, 2011, "container" [MCZY0004283]</p> <p>ASTM Dictionary of Engineering Science & Technology, Tenth Edition, 2005, "container" [MCZY0004292]</p>

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		<p>Cambridge Advanced Learner's Dictionary, Fourth Edition, 2013, "container" [MCZY0004299]</p> <p>Collins English Dictionary, Twelfth Edition, 2014, "container" [MCZY0004315]</p> <p>Dictionary Science and Tech and Technology, Second Edition, 2007, "container" [MCZY0004307]</p> <p>Longman Dictionary of American English, Fifth Edition, 2014, "container" [MCZY0004325]</p> <p>Merriam-Webster collegiate dictionary, Eleventh Edition, 2003, "container" [MCZY0004329]</p> <p>Oxford Advanced Learner's Dictionary of Current English, Ninth Edition, 2015, "container" [MCZY0004346]</p> <p>The Chambers Dictionary, Thirteenth Edition, 2014, "container" [MCZY0004303]</p>
"close to a base of the housing"	'893 Patent, claim 3	<p><u>Proposed Construction:</u> Indefinite</p> <p><u>Intrinsic Evidence:</u> '893 Patent at 53:49-64, 54:37-47, 55:49-53, 56:27-31, 57:14-23, 58:19-25, 59:49-53, Cl. 3, Fig. 6, Fig. 8,</p>

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		<p>U.S. Patent Application No. 17/203,050 Prosecution History at pg. Elvie_Momcozy_0001154, Elvie_Momcozy_0001155, Elvie_Momcozy_0001157, Elvie_Momcozy_0001159, Elvie_Momcozy_0001161, Elvie_Momcozy_0001163, Elvie_Momcozy_0001185, Elvie_Momcozy_0000951, Elvie_Momcozy_0000953, Elvie_Momcozy_0000597, Elvie_Momcozy_0000561, Elvie_Momcozy_0000317, Elvie_Momcozy_0000189.</p> <p><u>Extrinsic Evidence:</u> Expert evidence will show that the intrinsic evidence fails to inform with reasonable certainty those skilled in the art about the scope of the invention. Expert evidence will also show the relevant state of the art, the ordinary skill in the art, how the intrinsic and extrinsic evidence inform the construction of the term, the nature of the claimed invention, and any other opinions or testimony useful to the Court in determining the proper scope of the disputed term.</p>
“substantially rigid”	'893 Patent, claim 6, 16 '380 Patent, claims 8, 35 '381 Patent, claims 13	<p><u>Proposed Construction:</u> indefinite</p> <p><u>Intrinsic Evidence:</u> '893 patent at 33:10-13, 36:7-9, 68:65-68</p> <p>U.S. Patent Application No. 17/203,050 Prosecution History at pg. Elvie_Momcozy_0001084, Elvie_Momcozy_0001137, Elvie_Momcozy_0000878, Elvie_Momcozy_0000921.</p>

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		<p>U.S. Patent Application No. 17/203,327 Prosecution History at pg. Elvie_Momcozy_0002334, Elvie_Momcozy_0001960, Elvie_Momcozy_0001533.</p> <p>'380 Patent Parent Prosecution History at MCZY0006776, MCZY0007047.</p> <p>U.S. Patent Application No. 16/009,547 Prosecution History at MCZY0005028.</p> <p><u>Extrinsic Evidence:</u> Expert evidence will show that the intrinsic evidence fails to inform with reasonable certainty those skilled in the art about the scope of the invention. Expert evidence will also the relevant state of the art, the ordinary skill in the art, how the intrinsic and extrinsic evidence inform the construction of the term, the nature of the claimed invention, and any other opinions or testimony useful to the Court in determining the proper scope of the disputed term.</p> <p>American Heritage Dictionary of the English Language, Fifth Edition, 2011, "rigid" [MCZY0004283]</p> <p>Cambridge Advanced Learner's Dictionary, Fourth Edition, 2013, "rigid" [MCZY0004299]</p> <p>Collins English Dictionary, Twelfth Edition, 2014, "rigid" [MCZY0004315]</p>

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<p>"configured to rotate smoothly around a nipple inserted into the nipple tunnel to provide a correct positioning of the breast shield onto a breast"</p>	<p>'893 Patent, claim 7 '380 Patent, claims 2, 30 '381 Patent, claim 2</p>	<p><u>Proposed Construction:</u> Indefinite</p> <p><u>Intrinsic Evidence:</u> '893 patent at 19:8-10, 64:40-43.</p> <p><u>Extrinsic Evidence:</u> Expert evidence will show that the intrinsic evidence fails to inform with reasonable certainty those skilled in the art about the scope of the invention. Expert evidence will also show the relevant state of the art, the ordinary skill in the art, how the intrinsic and extrinsic evidence inform the construction of the term, the nature of the claimed invention, and any other opinions or testimony useful to the Court in determining the proper scope of the disputed term.</p>

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<p>“the housing is configured to slide onto the breast shield, when the breast shield has been placed onto a breast, using guide members”</p>	<p>'893 Patent, claim 12 '381 Patent, claims 8</p>	<p><u>Proposed Construction:</u> “when the breast shield has been placed onto a breast, the housing is able to slide onto the breast shield using guide members”</p> <p><u>Intrinsic Evidence:</u> '893 Patent at 5:54-57, 10:5-30, 18:45-19:16, 37:10-14, 38:24-33, Fig. 3, Fig. 4.</p> <p>U.S. Patent Application No. 17/203,050 Prosecution History at pg. Elvie_Momcozy_0000190, Elvie_Momcozy_0000318, Elvie_Momcozy_0000334, Elvie_Momcozy_0000556, Elvie_Momcozy_0000606, Elvie_Momcozy_0000661-662.</p> <p><u>Extrinsic Evidence:</u> A Dictionary of Mechanical Engineering, Third Edition, 2013, “slide” [MCZY0004296]</p> <p>American Heritage Dictionary of the English Language, Fifth Edition, 2011, “slide” [MCZY0004283]</p> <p>Collins English Dictionary, Twelfth Edition, 2014, “slide” [MCZY0004315]</p> <p>Dictionary Science and Tech and Technology, Second Edition, 2007, “slide” [MCZY0004307]</p> <p>Merriam-Webster collegiate dictionary, Eleventh Edition, 2003, “slide” [MCZY0004329]</p>

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		New Oxford American Dictionary, Third Edition, 2010, "slide" [MCZY0004338]
"fixed to"	'380 Patent, claim 1	<p><u>Proposed Construction:</u> "unremovably connected to during normal operation, use, and maintenance"</p> <p><u>Intrinsic Evidence:</u> '380 patent at 11:23-27, 13:47-51, 14:19-24, 14:37-41, 15:1-3.</p> <p>U.S. Patent Application No. 17/203,327 Prosecution History at pg. Elvie_Momcozy_0002538-41, Elvie_Momcozy_0001907, Elvie_Momcozy_0001913, Elvie_Momcozy_0001903, Elvie_Momcozy_0001875, Elvie_Momcozy_0001706-07, Elvie_Momcozy_0001692, Elvie_Momcozy_0001698, Elvie_Momcozy_0001680, Elvie_Momcozy_0001653, Elvie_Momcozy_0001661.</p> <p><u>Extrinsic Evidence:</u> American Heritage Dictionary of the English Language, Fifth Edition, 2011, "fixed" [MCZY0004283]</p> <p>Collins English Dictionary, Twelfth Edition, 2014, "fix" [MCZY0004315]</p> <p>Dictionary Science and Tech and Technology, Second Edition, 2007, "fix" [MCZY0004307]</p>

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